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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
11

12 **In the Matter of the Seizure of:**

13 Any and all funds held in Republic
Bank of Arizona Account(s)
14 xxxx1889, xxxx2592, xxxx1938,
xxxx2912, and xxxx2500.

CASE NO. 2:18-cv-06742-RGK-PJW

**CLAIMANT JOHN BRUNST'S
JOINDER IN JAMES LARKIN'S
OPPOSITION TO GOVERNMENT'S
MOTION TO STAY CIVIL CASE**

Assigned to Hon. R. Gary Klausner

1 TO THE COURT AND ALL COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE THAT Claimant John Brunst, by and through his
3 counsel, will and hereby does join in James Larkin's Opposition to Government's
4 Motion to Stay Civil Case ("Opposition") [D.E. 80], and adopts all of the positions
5 set forth in the Opposition as if fully set forth herein.

6 Mr. Brunst joins in the Opposition because he is "so similarly situated [to
7 Mr. Larkin] that filing an independent [opposition] would be redundant." *Tatung*
8 *Co., Ltd. v. Shu Tze Hsu*, 217 F. Supp. 3d 1138, 1151 (C.D. Cal. 2016). Like
9 Mr. Larkin, Mr. Brunst holds an interest in assets that were seized pursuant to civil
10 seizure warrants issued by the magistrate judges in this District, and which are the
11 subject of Mr. Larkin's Motion to Vacate or Modify Seizure Warrants (the "Seizure
12 Motion") [D.E. 6].¹ The Opposition raises issues that are directly relevant to and
13 overlap with the seizures of Mr. Brunst's assets. All of the arguments made in the
14 Opposition therefore apply with equal force to the seizure warrants issued against
15 the assets in which Mr. Brunst holds an interest.

16
17 DATED: October 17, 2018

Respectfully submitted,

18 Bird, Marella, Boxer, Wolpert, Nessim,
19 Dooks, Lincenberg & Rhow, P.C.

20 By: /s/ Gary S. Lincenberg

21 Gary S. Lincenberg

22 Attorneys for Claimant John Brunst

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24 ¹ On August 6, 2018, Mr. Brunst filed a joinder in the Seizure Motion as to the
25 three seizure warrants that purport to seize assets in which Mr. Brunst holds an
26 interest. D.E. 9. Counsel understands that these three warrants, along with the
27 14 other seizure warrants that purport to seize funds derived from Backpage.com
28 advertisements that allegedly solicited prostitution, have been consolidated with the
above-captioned seizure warrant, and were subsequently transferred from Magistrate
Judge Walsh to District Judge Klausner as a new civil action. D.E. 14.